

Internal Revenue Service

Department of the Treasury
Washington, DC 20224

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Person To Contact:
, ID No.
Telephone Number:

Refer Reply To:
CC:PSI:B04 – PLR-142589-10
Date: OCTOBER 27, 2010

Re:

Legend

Decedent =

Dear :

This responds to a letter from your authorized representative, dated September 21, 2009, requesting an extension of time under § 301.9100 of the Procedure and Administration Regulations to make an alternate valuation election under § 2032 of the Internal Revenue Code.

The Internal Revenue Service previously issued PLR-151976-09 (201033023) on May 3, 2010 to Decedent's estate. After reconsideration, we conclude that Decedent's estate meets the requirements for relief and, accordingly, grant an extension of time of 120 days from the date of this letter to make the alternate valuation election under § 2032.

The election should be made on a supplemental Form 706 and filed with the Internal Revenue Service Center in Cincinnati. A copy of this letter should be forwarded to the Internal Revenue Service, Cincinnati Service Center – Stop 82, Cincinnati, OH 45999, for association with the Form 706.

Except as specifically ruled herein, we express or imply no opinion on the federal tax consequences of the transaction under the cited provisions or under any other provisions of the Code.

This ruling is directed only to the taxpayer requesting it. Section 6110(k)(3) provides that it may not be used or cited as precedent.

PLR-142589-10

The ruling in this letter pertaining to the federal estate tax applies only to the extent that the relevant sections of the Internal Revenue Code are in effect during the period at issue.

Pursuant to a power of attorney on file with this office, a copy of this letter is being sent to your authorized representative.

Sincerely,

Associate Chief Counsel
(Passthroughs & Special Industries)

By: _____
Lorraine Gardner, Senior Counsel
Branch 4
Office of Associate Chief Counsel
(Passthroughs & Special Industries)

Enclosures

Copy for section 6110 purposes
Copy of this letter